

# EXHIBIT N



Homeland  
Security

August 2, 2022

**SENT VIA E-MAIL TO: [dwyermd@brennan.law.nyu.edu](mailto:dwyermd@brennan.law.nyu.edu)**

Mary P. Dwyer  
Fellow, Liberty & National Security Program  
Brennan Center for Justice at NYU  
School of Law  
1140 Connecticut Avenue, NW  
Suite 1150  
Washington, DC 20036

Dear Requester Dwyer:

This is the final response to your Freedom of Information Act (FOIA) request to the Department of Homeland Security (DHS), Office of Intelligence and Analysis (I&A), dated December 7, 2021 and your appeal dated April 19, 2022. You were seeking:

“specifically requests records under FOIA that were in DHS’s possession or control from January 1, 2016, through the date of the production of records, in the following categories:

1. Recordkeeping: All recordkeeping, logs, or digests reflecting the use of Voyager Labs, Logically, Inc., or ShadowDragon products or services for social media monitoring, or searches of social media for purposes including criminal investigations, situational awareness, preparation for events, monitoring of protests or other gatherings, or public safety.
2. Purchase Agreements and Orders: All records reflecting a contract or agreement to purchase, acquire, use, test, license, or evaluate any product or service developed by Voyager Labs, Logically, Inc., or ShadowDragon.
3. Use for Purposes Other Than Background Checks: All records reflecting the number of circumstances in which Voyager Labs, Logically, Inc., or ShadowDragon products or services were used to collect information about individuals from social media for purposes other than background checks for DHS employment, including regarding protest activity, as well as the number of such matters in which an individual or group was referred to prosecutors.
4. Audits: All records of, or communications regarding, audits or internal reviews of the Department’s use of Voyager Labs, Logically, Inc., or ShadowDragon products or services.

5. Training Materials: All training documents pertaining to the use of Voyager Labs, Logically, Inc., or ShadowDragon products or services, including drafts, and including but not limited to PowerPoint presentations, handouts, manuals, or lectures.
6. Legal Justifications: All records reflecting final agency memoranda articulating the legal justification(s) for the use of Voyager Labs, Logically, Inc., or ShadowDragon products or services, or other social media monitoring services.
7. Information Sharing Communications: All communications with the Federal Bureau of Investigation, state or local law enforcement agencies, or fusion centers, regarding use of Voyager Labs, Logically, Inc., or ShadowDragon products or services or information obtained from those products or services. This includes, but is not limited to, communications regarding information sharing in response to protests from May 2020 through August 2020.<sup>9</sup>
8. Nondisclosure Agreements: All records regarding DHS's nondisclosure or confidentiality obligations in relation to contracts or use agreements with Voyager Labs, Logically, Inc., or ShadowDragon.
9. Vendor Communications: All email communications with representatives of Voyager Labs, Logically, Inc., or ShadowDragon concerning their social media monitoring products or services, including the attachments to those emails.
10. Internal Communications: All email communications among DHS employees, officials, or contractors regarding social media monitoring products or services offered by Voyager Labs, Logically, Inc., or ShadowDragon, including the attachments to those emails."

A I&A FOIA search confirmed that these products were not used. Unfortunately, we were unable to locate or identify any responsive records.

While an adequate search was conducted, you have the right to appeal this determination that no records exist within I&A that would be responsive to your request.<sup>1</sup> Should you wish to do so, you must send your appeal and a copy of this letter, within 90 days of the date of this letter, to: Privacy Office, Attn: FOIA Appeals, U.S. Department of Homeland Security, 245 Murray Lane, SW, Mail Stop 0655, Washington, D.C. 20528-0655, following the procedures outlined in the DHS FOIA regulations at 6 C.F.R. Part 5 § 5.8. Your envelope and letter should be marked "FOIA Appeal." Copies of the FOIA and DHS FOIA regulations are available at [www.dhs.gov/foia](http://www.dhs.gov/foia).

You may contact the FOIA Requester Service Center for the Office of Intelligence and Analysis (I&A) for any further assistance; to discuss any aspect of your request; to discuss reformulation of your request; and/or to discuss an alternative time frame for the processing of your request at:

---

<sup>1</sup> For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. *See* U.S.C. 552© (2006 & Supp. IV 2010). This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

U.S. Department of Homeland Security  
Intelligence and Analysis (I&A)  
Email: I&AFOIA@HQ.DHS.GOV  
**Refer to 2022-IAFO-00037, 2022-HQAP-00156**

Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA dispute resolution services it offers. The contact information for OGIS is:

Office of Government Information Services  
National Archives and Records Administration  
8601 Adelphi Road-OGIS  
College Park, Maryland 20740-6001  
Email: [ogis@nara.gov](mailto:ogis@nara.gov)  
Telephone: 202-741-5770  
Toll free: 1-877-684-6448  
Fax: 202-741-5769

Please note that contacting any agency official (including the FOIA analyst, FOIA Requester Service Center, FOIA Public Liaison) and/or OGIS **is not** an alternative to filing an administrative appeal and **does not** stop the 90-day appeal clock.

Sincerely,  
*Meekia W*  
Meekia W.  
Assistant FOIA Officer